

REMARKS

A. Status of the Application

- Claims 12-16 and 18-22 are pending in the application, of which claims 12 and 30 are independent claims.
- Claims 1-11, 17 and 23-29 are cancelled.
- Claims 12-15 and 18-22 are amended. All amendments are supported by the specification and claims as originally filed. No new matter has been added.
- Claims 30-38 are newly added. No new matter has been added.

Applicants have amended the claims to recite particular embodiments that Applicants, in their business judgment, have determined to be commercially desirable at this time. The claim amendments have not been submitted for any reasons relating to patentability.

B. Rejection Under 35 U.S.C. § 103

Claims **1-29** were rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,134,535 (“Belzberg”) in view of U.S. Patent No. 5,297,031 (“Gutterman”). Applicants believe that the rejection is moot. The Office Action does not teach “each and every” limitation of the independent claims, and as such, the Office Action fails to establish a *prima facie* case of obviousness for any of the claims.

For example, neither the cited-portions of Belzberg or Gutterman teach or suggest the following limitation of independent claims **12** and **30**:

in response to a different one of the first plurality of key being pressed, directing the display device to select the second quadrant *and re-map each of the second plurality of keys to execute a second function* that corresponds to the first

benchmark instrument, in which *the second function differs from the first function.*

(emphasis added).

The Examiner concedes that Belzberg fails to teach the limitation “mapping the second plurality of keys.” Office Action, p.4. Instead, he alleges, albeit incorrectly, that the cited-portions of Guterman teach this missing limitation. Specifically, the Examiner states the following:

In FIG 2b, since the deck area for instrument US-Z is selected and issues related to US-Z are displayed, the buttons such as SEND, CNCL, FILL, LOOK, QUERY, ACCEPT, ALL, and TOTAL are all used for placing orders on specific issues (130-1, 139-2, etc.) displayed in the deck area. When one of the other deck area (quadrant) buttons is pressed, such as US-H, US-M, or US-L, the corresponding deck area is selected and displayed. *Then, all the buttons, such as SEND, CNCL, FILL, LOOK, QUERY, ACCEPT, ALL, and TOTAL, which were previously used and therefore mapped to placing specific order on specific issues of US-Z, are then remapped so that they can be used for placing orders on specific issues related to the newly selected instrument.*

(emphasis added).

However, the Examiner’s understanding of Guterman is flawed. In Guterman, a user first selects a deck area that is associated with a particular financial instrument. *See Guterman, col 13, ll. 7-10.* In response to this selection, the system expands the selected “deck area onto the full deck pane,” which displays the available specific issues associated with the selected financial instrument. *Id.* at col. 13, ll. 15-19; Fig. 2b. After the user selects a specific issue from the deck area, he selects a generic command key (e.g., FILL or SEND) in order to execute the function associated with the generic command key for the selected specific issue.

If the user subsequently selects a different financial instrument, then a different deck area (along with different specific issues) will be displayed. However, the function of the generic command key *remains the same*. The fact that the user has selected a different

deck area does not result in any “remapping” of function for the generic keys. The FILL key and the SEND key still perform the same functions. It is the *combination* of the generic key with a selection of a specific issue that results in a different result.

By contrast, independent claims **12** and **30** describe a situation where the selection of a particular quadrant automatically remaps the function associated with each of the keys on the keyboard. Each key corresponds to a particular function, and the pressing of a single key, results in the execution of that function. There is no need to combine a specific issue with a generic key—the user merely executes his desired function by pressing a single key that has been remapped.

For example, in Microsoft Word, the program offers its users various shortcut commands, such as CTRL key + C (which “copies” a selection) and CTRL key +P (which “pastes” a selection). Under the Examiner’s flawed logic, the CTRL key is “remapped” each time someone uses the shortcut functions for “copy” or “paste.” However, in reality, the functionality of the CTRL key remains the same. It is the combination of keystrokes (e.g., the combination of the generic CTRL key with a pressing of the C button) that results in a different function.

Clearly, the combination of keystrokes to generate a different function is not a teaching or suggestion of remapping a key on a keyboard, so that a user pressing that single key can generate a different function. As such, the Examiner has failed to make a *prima facie* showing of obviousness for independent claims **12** and **30**. For at least this reason, claims **12** and **30** (and the claims that depend therefrom) are in condition for allowance.

C. General Comments on Dependent Claims

Each dependent claim is patentable for at least the same reasons as the independent claim on which it depends. Thus, Applicants believe that it is unnecessary at this time to argue the allowability of each dependent claim individually. However, Applicants do not necessarily concur with the interpretation of the dependent claims as set forth in the Office Action, nor do Applicants concur that the basis for the rejection of any of the dependent

claims is proper. Therefore, Applicants reserve the right to specifically address the patentability of the dependent claims in the future, if deemed necessary.

D. Authorization for Email Communication

Recognizing that Internet communications are not secure, Applicants hereby authorize the USPTO to communicate with any authorized representative concerning any subject matter of this application by electronic mail. Applicants understand that a copy of these communications will be made of record in the application file.

E. Conclusion

In general, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as a concession of any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, Applicants respectfully submit that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at the address shown below. All communications should be directed to the undersigned at her direct line (857) 413-2056 or e-mail address: rma@cantor.com.

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